

## McMAHON, DeGULIS, HOFFMANN & LOMBARDI

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August 24, 2001

Via Telecopies (312) 886-7160

Thomas Nash
Associate Regional Counsel
Office of Regional Counsel (C-14J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Chemical Recovery Systems Site Elyria, Ohio

Dear Mr. Nash:

This letter responds to U.S. EPA's request for a good faith offer for the Chemical Recovery Systems site by August 25, 2001.

Through a letter dated August 21, 2001, two of my clients, Nordson and American Greetings, were part of a Low Volume Group which submitted a good faith offer through the August 21, 2001 letter from Terry Schnell.

In addition, I represent Mameco, Inc. which is just above the 1% threshold referenced in the Low Volume Group letter of August 21, 2001.

As indicated by all parties involved in this matter, the data upon which allocation decisions are now being made, including the 1% threshold, is incomplete. On behalf of Mameco, we maintain that Mameco is below the 1% threshold for de minimis consideration by U.S. EPA.

Through counsel, Mameco is still participating in the Low Volume Group discussions, and will send a representative to a meeting with the Larger Volume Group PRPs on August 27, 2001 in Cleveland. Mameco is also prepared to fund a reasonably allocated share of the RI/FS costs, and any recoverable response costs incurred by U.S. EPA.

Thomas Nash
August 24, 2001
Page 2

If you have any questions concerning Mameco's position, please call at your convenience.

Sincerely,

McMAHON, DeGULIS, HOFFMANN & LOMBARDI LLP

Gregory J. DeGulis

GJD: jmp

Copy: Shawn McGraw